

We are extremely pleased that the FCC has received a recommendation from NECA to have a 2008-2009 fund year reimbursement rate of \$2.7248, which includes \$1.131 to be used for STS outreach. It would be very wise of the FCC to accept this recommendation including the incentive to encourage providers to make information about STS available to more consumers. An extremely small percentage of STS consumers appear to know that this service is available.

While the reimbursement rate set by the FCC applies to interstate calls, the vast majority of STS calls are intrastate calls. Generally, states reimburse providers at a much lower rate than the federal rate. In fact, providers often take a big loss on STS in order to obtain a statewide TRS contract. For example, in California the STS rates paid to all providers is less than a \$1.50 per minute. Providers have informed the FCC that the cost of providing Speech-to-Speech is \$3.4546 per minute.

Section 225 of the Communications Act requires telecommunications relay services that are functionally equivalent to traditional voice telephone services to be made available to the extent possible to individuals who are deaf, hard of hearing or speech-impaired. If consumers with speech impairments do not know that STS is available, then STS is not being made available to all speech-impaired individuals and a Section 225 violation is occurring. Over eighty people have filed comments in this proceeding asking the FCC to take action to ensure that all states increase the STS reimbursement rate to comply with this law. People with speech disabilities deserve equal protection under the law. I am again asking the FCC to fulfill its obligations under section 225 to make STS available to the extent possible to all speech-impaired Americans by encouraging states to raise their rates for intrastate STS.